

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

<b>CHRISTI ROBERTS KOLB,</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	
<b>vs.</b>	)	<b>Case No. 21 CV 3235</b>
	)	
	)	
<b>AMERICAN BAR ASSOCIATION,</b>	)	
	)	
<b>Defendant.</b>	)	<b>JURY DEMAND</b>

**COMPLAINT**

Plaintiff Christi Roberts Kolb (“Plaintiff”) brings this action against Defendant American Bar Association (“Defendant”) under the Equal Pay Act of 1963, 29 U.S.C. § 206 et. seq. (“EPA”), for Defendant discriminating against her in terms of pay on the basis of her gender.

**JURISDICTION AND VENUE**

1. Jurisdiction of this Court is invoked pursuant to 28 U.S.C. 1331.
2. Venue for this action is proper in the United States District Court for the Northern District of Illinois, Eastern Division, under 28 U.S.C. § 1391(b)(1)-(2) and (d) because the employment practices hereafter alleged to be unlawful were committed in the Northern District of Illinois and because Defendant's contacts are sufficient to subject it to personal jurisdiction in that district.

**PARTIES**

3. Plaintiff is a female and is a resident of Mobile, Alabama.
4. At all times relevant, Defendant was, and is, a not-for-profit corporation with the main office located in Chicago and within the Northern District of Illinois

organized under the laws of Illinois and with offices in other states.

5. At all times relevant to the allegations herein, Defendant was an "employer" of Plaintiff, and Plaintiff was an "employee" of Defendant, as those terms are defined under the EPA.

### **FACTUAL ALLEGATIONS**

6. Plaintiff began employment with Defendant in or around October of 2018 and was employed until July of 2019, when she resigned.

7. Plaintiff was initially hired by Defendant as Senior Technical Advisor and her most recent position with Defendant was as Acting Country Director.

8. Plaintiff has over 25 years of experience as a litigator and international expert with international program experience assisting other countries to deepen the understanding of the rule of law principles and to improve litigation skills.

9. Throughout Plaintiff's employment with Defendant, she has been paid significantly less than similarly situated, male employees with equal or less experience and similar or fewer credentials.

10. Plaintiff attempted to negotiate a better salary and was told that the budget could not sustain a higher salary which Plaintiff found was untrue when she later learned male employees were being paid significantly more than her.

### **COUNT I (EPA- GENDER DISCRIMINATION)**

11. Plaintiff re-alleges paragraphs 1 through 10 and incorporates them as if fully set forth herein.

12. EPA makes it unlawful for an employer to discriminate against an employee on the basis of his or her gender.

13. By its conduct as alleged herein, Defendant discriminated against Plaintiff based upon her gender by paying her substantially less than less qualified, similarly situated male employees.

14. Plaintiff has suffered monetary loss and emotional distress as a result of Defendant's conduct.

15. Defendant's conduct toward Plaintiff illustrated a willful and/or reckless disregard of Plaintiff's right to be free from impermissible gender discrimination.

**PRAYER FOR RELIEF AS TO COUNT I**

WHEREFORE, the Plaintiff prays that the court order such relief as is necessary to make the plaintiff whole, including:

- a. Injunctive relief;
- b. Lost wages and other economic damages, if any;
- c. Compensatory damages for pain and suffering;
- d. Attorneys' fees and costs incurred in this action;
- e. Such other relief as is just and equitable;
- f. The plaintiff requests a jury trial of this action.

CHRISTI ROBERTS KOLB

**BY: Michael T. Smith**

Michael T. Smith  
Trial Attorney

Michael T. Smith #6180407IL  
10 N. Martingale Rd., Suite 400  
Schaumburg, IL 60173  
(847) 466-1099